

**MEMO ENDORSED**

December 17, 2024

Honorable Judge Valerie E. Caproni  
United States District Court for  
The Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Maurilia Gervacio De Los Angeles v. Washland LLC (D/B/A Washland),,  
Joseph Walter Giaimo, and Patricia Miller, 24-cv-05749 (VEC)

Dear Honorable Judge Caproni:

I was recently retained to represent the defendants in the above-referenced matter.

My office contacted plaintiff's counsel, Jesse Barton, earlier today to request a thirty (30) day adjournment of the order to show cause (Docket No. 37), currently returnable on December 20, 2024.

This request is necessary as I am presently dealing with a family emergency that requires my immediate attention. Mr. Barton has kindly consented to the requested adjournment.

Accordingly, I respectfully request that the Court approve the adjournment and reschedule the return date for the order to show cause to a date thirty (30) days from its original return date, or another date convenient to the Court.

Thank you for your consideration of this matter.

Very truly yours,

*David Moss*

David L. Moss, Esq.  
DM 2468

Application GRANTED. IT IS HEREBY ORDERED that Defendants Washland LLC. (d/b/a Washland), Joseph Walter Giaimo, and Patricia Miller show cause before the Honorable Judge Caproni, in courtroom 443, United States District Court for the Southern District of New York, 40 Foley Square, in the City, County and State of New York, on January 17, 2025 at 10:00 A.M., why a default judgment should not be entered against them pursuant to Rule 55 of the Federal Rules of Civil Procedure.

SO ORDERED.

12/17/24

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE